

EXHIBIT 11

[REDACTED VERSION]

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JCC

**VALVE CORPORATION'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' SECOND SET OF
INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Valve Corporation ("Valve"), by and through its undersigned counsel, responds and objects to Plaintiffs' Second Set of Interrogatories (individually an "Interrogatory" and collectively the "Second Interrogatories") as follows:

GENERAL OBJECTIONS

Valve makes the following General Objections to the Second Interrogatories. These General Objections apply and are incorporated into each of Valve's responses below, whether or not also expressly restated in a particular response (for emphasis or otherwise) or incorporated into a particular response. Valve's responses and objections as set forth herein are made without prejudice to Valve's right to assert further responses or objections should Valve discover additional grounds for such responses or objections. The assertion of the same, similar, or additional

INTERROGATORY NO. 14:

Your Tenth Affirmative Defense in Your Answer and Affirmative Defenses to Consolidated Amended Class Action Complaint states: “As long as Valve has a valid business reason for the terms it attaches to its Steam Keys, which it does, those terms are not unlawful.” (Dkt. # 104.) Identify each and every “valid business reason for the terms [Valve] attaches to its Steam Keys” and all material documents reflecting, memorializing, or evidencing the same.

RESPONSE TO INTERROGATORY NO. 14:

In addition to its General Objections, Valve objects to this Interrogatory because it impermissibly seeks a legal conclusion concerning the validity of Valve’s business reasons for the terms it attaches to its Steam Keys. Valve also objects to this Interrogatory insofar as it prematurely seeks expert opinion or testimony, which Valve shall provide at the time and in the manner set forth in the case schedule, the Federal Rules of Civil Procedure, and the Western District of Washington Local Rules. Valve further objects to this Interrogatory because it purports to seek information, documents or communications protected from discovery or disclosure by the attorney-client privilege, work product doctrine, or any other applicable privilege, immunity or grounds for withholding information, or purport to require Valve to provide information from its attorneys. Valve objects to this Interrogatory’s use of the phrase “material documents” as vague to the extent it leaves Valve guessing as to what should be considered “material.”

Based on its objections, Valve is not presently responding to this Interrogatory, but invites Plaintiffs to meet and confer.

DATED this 13th day of March, 2023.

s/ Gavin W. Skok

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CERTIFICATE OF SERVICE

I certify that I am a secretary at the law firm of Fox Rothschild LLP in Seattle, Washington. I am a U.S. citizen over the age of eighteen years and not a party to the within cause. On the date shown below, I caused to be served a true and correct copy of the foregoing on counsel of record for all other parties to this action as indicated below:

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SECOND SET OF INTERROGATORIES (2:21-CV-00563-JCC) - 33

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Executive Committee

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED this 13th day of March, 2023, in Seattle, Washington.


 Courtney R. Brooks

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